

1 Hon. James L. Robart  
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UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

8 DANIEL ESPINOZA,

9 Plaintiff,  
10 v.  
11 THE CITY OF SEATTLE, WASHINGTON,  
and LIEUTENANT THOMAS MAHAFFEY,  
12 individually,  
13 Defendants.

No. C17-01709-JLR

**STIPULATION AND [PROPOSED]  
ORDER AMENDING ORDER  
REGARDING INITIAL DISCLOSURES  
AND JOINT STATUS REPORT**

**[CLERK'S ACTION REQUIRED]**

COME NOW the parties, Plaintiff Daniel Espinoza, represented by Thomas G. Jarrard and Matthew Z. Crotty, and Defendant City of Seattle, represented by Assistant City Attorney David Bowman, and stipulate to amendment of the Court's Order Regarding Initial Disclosures and Joint Status Report dated December 8, 2017, by establishing the following dates for initial disclosure and submission of the Joint Status Report and Discovery Plan:

Deadline for FRCP 26(f) Conference:	1/12/2018
Initial Disclosures Pursuant to FRCP 26(a)(1):	1/26/2018
Combined Joint Status Report and Discovery Plan as Required by FRCP 26(f) and Local Civil Rule 26(f):	2/2/2018

STIPULATION AND ORDER AMENDING ORDER REGARDING  
INITIAL DISCLOSURES AND JOINT STATUS REPORT  
(C17-01709-JLR) - 1

Peter S. Holmes  
Seattle City Attorney  
701 Fifth Avenue, Suite 2050  
Seattle, WA 98104-7097  
(206) 684-8200

1 The parties make this request on the following grounds pursuant to Local Civil Rule 16(b)(4): On  
2 December 5, 2017, by stipulation of the parties the Court ordered an extension time for Defendant  
3 City of Seattle to file its Answer to Plaintiff's Complaint, to January 5, 2018. Although the parties do  
4 not wish to cause any unnecessary delay to the case and are proceeding diligently to connect with  
5 witnesses and ascertain what documents will be needed to support their respective claims and  
6 defenses, Defendants need additional time to prepare for the Rule 26(f) initial discovery conference  
7 and initial disclosures due to the scope of potential witnesses, documents and information that must  
8 be identified and sought. The parties respectfully ask that the Court find good cause exists to modify  
9 its Order Regarding Initial Disclosures and Joint Status Report.

10 DATED this 12th day of December, 2017.

11 PETER S. HOLMES  
Seattle City Attorney

LAW OFFICE OF THOMAS G.  
JARRARD, PLLC

12 By: s/ David Bowman  
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14 Attorneys for Defendant City of Seattle

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16 Attorneys for Plaintiff

17 STIPULATION AND ORDER AMENDING ORDER REGARDING  
18 INITIAL DISCLOSURES AND JOINT STATUS REPORT  
(C17-01709-JLR) - 2

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## ORDER

Based on the foregoing stipulation of the parties and good cause appearing, NOW,  
**THEREFORE,**

**IT IS ORDERED** that the Order Regarding Initial Disclosures and Joint Status Report dated December 8, 2017, is amended as follows: The Court sets the following dates for initial disclosure and submission of the Joint Status Report and Discovery Plan:

Deadline for FRCP 26(f) Conference: 1/12/2018

Initial Disclosures Pursuant to FRCP 26(a)(1): 1/26/2018

Combined Joint Status Report and Discovery  
Plan as Required by FRCP 26(f)  
and Local Civil Rule 26(f): 2/2/2018

DATED this 13 day of December, 2017.

James L. Robart, Judge  
U.S. District Court  
Western District of Washington

Presented by:

PETER S. HOLMES  
Seattle City Attorney

LAW OFFICE OF THOMAS G.  
JARRARD, PLLC

By: s/ David Bowman

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s/ Thomas G. Jarrard  
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By: s/ Matthew Z. Crotty  
MATTHEW Z. CROTTY, WSBA #39284  
*Consent for signature obtained via e-mail*

**STIPULATION AND ORDER AMENDING ORDER REGARDING  
INITIAL DISCLOSURES AND JOINT STATUS REPORT  
(C17-01709-JLR) - 3**

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15 Attorneys for Plaintiff  
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#### CERTIFICATE OF SERVICE

I certify that, on this date, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the below-listed:

- Thomas G. Jarrard, TJarrard@att.net
- Matthew Z Crotty, matt@crottyandson.com,matthew.z.crotty@msn.com
- David Bowman, david.bowman@seattle.gov

In addition, I certify that I forwarded a copy of the proposed order, in Word format, to Judge Robart at: robartorders@wawd.uscourts.gov.

DATED this 12th day of December, 2017, at Seattle, Washington.

s/ Kim Fabel  
KIM FABEL

STIPULATION AND ORDER AMENDING ORDER REGARDING  
INITIAL DISCLOSURES AND JOINT STATUS REPORT  
(C17-01709-JLR) - 4

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